

# EXHIBIT 2

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

IN RE: SHALE OIL ANTITRUST  
LITIGATION

Case No. 1:24-md-03119-MLG-LF

This Document Relates to All Actions

**DECLARATION OF DARREN BROWN**

I, Darren Brown, hereby declare as follows:

1. My name is Darren Brown. I am the Natural Gas Marketing Senior Director for Pioneer Natural Resources USA, Inc. (“Pioneer USA”). The following facts are true and correct based on my personal knowledge and information obtained from the business records of Pioneer USA.

2. During the period January 1, 2021, through the present, all of the wells Pioneer USA operates were and are located in the Permian Basin in West Texas.

3. The vast and overwhelming majority of casinghead gas produced by Pioneer USA from the wells it operates is gathered and processed by Targa Pipeline Mid-Continent WestTex, LLC (“Targa”) at processing plants located in the Permian Basin in Texas. Those processing operations create the products of residue gas and natural gas liquids.

4. Pioneer USA’s supply of residue gas for sale to its downstream customers is the residue gas it receives from Targa at the tailgate, or exit point, of Targa’s processing plants in the Permian Basin.

5. Pioneer USA, from time to time, purchases, between the Targa processing plants and downstream delivery points to customers, minimal amounts of residue gas from third parties for balancing or mitigation purposes.

6. Over the period January 1, 2021, through December 31, 2024, more than 99 percent of Pioneer USA's residue gas supply was sold at delivery points in Texas and Arizona. Over that same four-year period, Pioneer purchased less than \$100,000 worth of residue gas and sold approximately \$2.9 million worth of residue gas in New Mexico. Pioneer's purchases of residue gas in New Mexico represented less than 2/100ths of 1 percent of the value of Pioneer's total purchases of residue gas over that four-year period, and Pioneer's sales of residue gas in New Mexico represented less than 7/100ths of 1 percent of Pioneer's total revenue from sales of residue gas over that four-year period.

7. Over the period January 1, 2021, through December 31, 2024, Pioneer purchased approximately \$4.2 million worth of residue gas in California (representing less than 1% of the value of Pioneer's total purchases of residue gas over that period) and sold approximately \$5.7 million worth of residue gas in California (representing less than 2/10ths of 1 percent of Pioneer's total revenue from residue gas sales over that period).

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on February 24, 2025, at 777 Hidden Ridge Dr., Irving, Texas.

By: Darren Brown  
Darren Brown (Feb 24, 2025 08:36 CST)  
Darren Brown